

February 6, 2020

VIA ECF & EMAIL

Hon. Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: *Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al.*, 18-CV-1781 (PGG)
Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., 18-CV-7692 (PGG)

Dear Judge Gardephe:

We represent Plaintiffs in the above-referenced cases, and write jointly following consultation among all Parties, pursuant to Rules I.A and IV.F of this Court's Individual Rules of Practice in Civil Cases.

Attached is a stipulation and proposed order (the "Stipulation") regarding the Confidentiality Agreement and Protective Order (the "Protective Order") previously entered in this litigation. (*Michelo* ECF No. 92; *Bifulco* ECF No. 48).

The Stipulation will facilitate timely third-party production pursuant to Rule 45 subpoenas that Plaintiffs have issued.

Counsel for these third parties has agreed to the terms of the Stipulation.

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Respectfully submitted,

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